

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Justification for Approval of an Immediate Removal
Increase at the Greenbrier River Site, Alderson,
Greenbrier County and Summers County, West Virginia

DATE: **NOV 20 1985**

FROM: James M. Seif *[Signature]*
Regional Administrator (3RA00)

TO: Dr. J. Winston Porter, Assistant Administrator
for Solid Waste and Emergency Response (WH-562-A)

Issue

The attached CERCLA funding request pertains to the Greenbrier River Site, Alderson, Greenbrier County and Summers County, West Virginia.

A preliminary assessment, performed in accordance with the National Contingency Plan by my staff and State personnel has identified an imminent and substantial threat to the environment posed by the presence of hazardous substances as defined in Section 101(14) of CERCLA.

Background

Section 104(a) of CERCLA authorizes the initiation of a Removal Action whenever any hazardous substance is released or there is a threat of a release into the environment.

Pursuant to Delegation of Authority 14-1-A (4/16/84), which authorized the Regional Administrator to approve CERCLA Removal Actions with a total cost of less than \$1,000,000 and approve exemptions to the six month removal limit, I have approved the use of CERCLA funds to control and stabilize this site.

Attachment

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841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Request for Approval of an Immediate Removal Increase
at the Greenbrier River Site, Greenbrier County and
Summers County, West Virginia

DATE: NOV 20 1985

FROM: Jan Rogers, OSC
Emergency Response Section (3HW22)

TO: James M. Seif
Regional Administrator (3RA00)

THRU: Stephen R. Wassersug, Director
Hazardous Waste Management Division (3HW00)

I. Purpose

The purpose of this Immediate Removal Request is to mitigate the immediate and significant threat to public health and the environment posed by drums of unknown chemicals, fuel oil and compressed gas tanks, and other waste materials at the Greenbrier River Site, Greenbrier County, West Virginia. The threats are those of direct contact with toxic and hazardous chemicals, fire and explosion of unknown contents of drums, and contamination of public water supplies of three towns serving a total of about 30,000 people. The funds requested will be used to stage, sample, transport and dispose of containerized waste materials from the site.

II. Background

The Greenbrier River Site is located along the banks of the Greenbrier River, beginning at a point approximately four miles below Alderson, West Virginia and continuing upstream about twenty miles to the location of the facilities suspected of losing the majority of drums. The drums and other containers are concentrated in two areas; one being Workman Island, three miles downstream from Alderson, West Virginia, and the other being upstream, close to the facilities where the drums were lost. Additional "stragglers" were found in isolated pockets along the banks of the river.

The Greenbrier River was the scene of a massive flood on November 4, 1985 that caused the drums and other containers to be swept downstream, where they lodged all along the river bank as the flood waters receded.

There are approximately 400 drums on Workman Island, of which 10% may hold product. At the upstream location there are approximately 300 drums of which 10% may have product. Additional drums may be buried under flood debris.

The facilities that are thought to have lost the major part of the drums are Jiffy Foam, Inc., and Appalachian Electronic Instruments, Inc., in Ronceverte, Greenbrier County, West Virginia. Neither facility has expressed any interest at this time in conducting a cleanup of the drums along the river. Discussions are continuing in attempts to get the Probable Responsible Parties to take over the cleanup.

The drums along the river and at both major concentrations are unsecured and open to public access. A number of attempts have been made by public citizens to obtain empty drums. National Guard units are currently deployed in the area maintaining security; however, they are neither permanent nor adequate to prevent public access to all of the drums.

At the request of the West Virginia Department of Natural Resources (WV DNR), a preliminary assessment was conducted by EPA, the WV DNR and the Roy F. Weston Technical Assistance Team (TAT) on November 15 and 16, 1985 to characterize and identify the hazards posed by this situation.

Although no sampling has been performed to date, the drums are thought to contain products used or produced by the upstream facilities. These products may include: Phenol, Sulfonic Acid, Acetic Acid, Trichlorotrifluoroethane, Fluorocarbons, Surfactants, Alkaline Etching solution containing ammonia, Sodium hydroxide, Dyes. Additional unknown materials may be present.

As of November 16, 1985, Thomas Massey authorized the OSC to use his authority to obligate \$50,000 to be used to address mitigation of the threats posed by this emergency. On November 16, 1985, ERCS mobilized personnel and equipment onscene to begin the Immediate Removal response, under the direction of OSCs Jan Rogers and Susan Fields, on loan from EPA Region IV.

III. Threat to Human Health

The Greenbrier Drum Site poses the threat of direct contact/inhalation due to the public's desire to obtain empty drums. By moving or sorting through piles of drums, citizens risk exposure to toxic and hazardous substances.

The site poses an imminent threat to the public water supplies of Talcott, West Virginia (population 2,000), Hinton, West Virginia (population 16,000) and Alderson, West Virginia (population 4,000), all of which utilize the water from the Greenbrier River and have intakes located downstream of major drum concentrations. Should there be a release of toxic substances or hazardous materials to the Greenbrier River from the

site, contamination could reach the taps of about 22,000 citizens. Such a release could occur at any time in the near future due to settling of flood debris, ruptured or damaged drums, public citizens tampering with the drums, or a second major flood.

IV. Enforcement

See Attachment

V. Proposed Project and Costs

At this time \$50,000 has been authorized under OSC's Emergency Authority to begin addressing the hazards posed by this site. Project funds are being used to characterize the waste materials onsite, segregate full and empty drums and containers, and stage containers. Funds are requested to complete this aspect of the Removal as well as to sample, analyze, transport and dispose of wastes already identified and expected to be identified as work progresses.

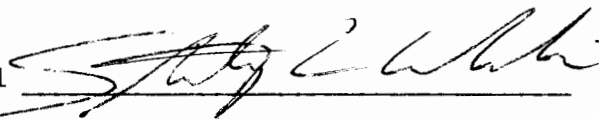
	<u>Funds Obligated To Date</u>	<u>Additional Funding Requested</u>
ERCS	\$50,000	\$ 70,000
TAT		30,000
Subtotal		\$100,000
15% EPA Administrative Costs		22,500
Subtotal		\$122,500
Intramural		23,000
Total	<u>\$50,000</u>	<u>\$146,000</u>

Total Project Ceiling \$196,000

VI. Regional Recommendation

Because conditions at the Greenbrier River Site meet the NCP Section 300.65 criteria for an Immediate Removal, I recommend your approval of the Immediate Removal Request. The estimated total Project Costs are \$196,000 of which \$120,000 will be obligated to ERCS. The OSC has already obligated \$50,000 based on his delegation of authority. This request is for an increase of \$146,000. You may indicate your approval or disapproval by signing below.

Approval



Date

11/20/85

Disapproval

Date

ATTACHMENT

Greenbrier River Site
Greenbrier and Summers Counties, West Virginia

Initial verbal contacts with Potential Responsible Parties produced a hesitancy to take responsibility for cleanup actions on the river. Additional contacts will be made with senior officials of Jiffy Foam, Inc., on Tuesday, November 19, 1985 when they can be contacted. Currently, the Jiffy Foam facility is closed. No Notice Letters or Administrative Orders have been issued to date due to the emergency nature of the incident and a need to act promptly to protect the downstream water intakes.

The site is not on the NPL.